

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

Fund Texas Choice, et al., Plaintiffs, v. José Garza, in his official capacity as District Attorney of Travis County, Texas, et al., Defendants.	Civil Case No. 1:22-cv-859-RP
---	--------------------------------------

**PLAINTIFFS' UPDATE REGARDING CONFERRAL WITH DEFENDANTS ON
PLAINTIFFS' MOTION FOR LEAVE TO FILE SECOND AMENDED
COMPLAINT AND JOIN PARTIES**

Plaintiffs Fund Texas Choice, The North Texas Equal Access Fund, The Lilith Fund for Reproductive Equity, Frontera Fund, The Afiya Center, West Fund, Jane's Due Process, Clinic Access Support Network, and Dr. Ghazaleh Moayedi, DO, MPH, FACOG ("**Plaintiffs**") now file this Update Regarding Conferral with Defendants on Plaintiffs' Motion for Leave to File Second Amended Complaint and Join Parties (the "**Motion for Leave**") [ECF 126].

When Plaintiffs filed their Motion for Leave, counsel for Defendant Garza had confirmed that her client had no position on the Motion for Leave. Counsel for Defendants Renken, Deski, McAfee, and Weber, however, had not yet had sufficient time to confer with his clients and determine their positions. Plaintiffs included that information in their certificate of conference and stated that they would update the Court once the position of those Defendants was confirmed. Counsel for Defendants Renken, Deski, McAfee, and Weber has now confirmed that those

Defendants also take no position on the Motion for Leave as there are no new claims or allegations asserted against these current Prosecutor Defendants.

Dated: April 17, 2023

Respectfully submitted,

/s/ Jennifer R. Ecklund

Jennifer R. Ecklund

Texas Bar No. 24045626

jecklund@thompsoncoburn.com

Elizabeth G. Myers

Texas Bar No. 24047767

emyers@thompsoncoburn.com

Allyn Jaqua Lowell

Texas Bar No. 24064143

alowell@thompsoncoburn.com

John Atkins

Texas Bar No. 24097326

jatkins@thompsoncoburn.com

Elizabeth Rocha

Texas Bar No. 24127242

erocha@thompsoncoburn.com

THOMPSON COBURN, LLP

2100 Ross Avenue, Suite 3200

Dallas, TX 75201

(972) 629-7100

(972) 629-7171 (facsimile)

Alexandra Wilson Albright

Texas Bar No. 21723500

aalbright@adjtlaw.com

Marcy Hogan Greer

Texas Bar No. 08417560

mgreer@adjtlaw.com

515 Congress Ave., Suite 2350

Austin, TX 78701-3562

Telephone: 512/482-9300

Facsimile: 512/482-9303

Kevin Dubose

Texas Bar No. 06150500
kdubose@adjtlaw.com
1844 Harvard Street
Houston, TX 77008
Telephone: 713/523-2358
Facsimile: 713/522-4553

Kirsten M. Castañeda

Texas Bar No. 00792401
kcastaneda@adjtlaw.com
8144 Walnut Hill Lane, Suite 1000
Dallas, TX 75231-4388
Telephone: 214/369-2358
Facsimile: 214/369-2359

**ALEXANDER DUBOSE &
JEFFERSON, LLP**

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this April 17, 2023, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system.

/s/ Jennifer R. Ecklund

Jennifer R. Ecklund